UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: TRIBUNE COMPANY FRAUDULENT CONVEYANCE LITIGATION

Case No. 11-MD-2296 (WHP) Case No. 12-MC-2296 (WHP)

DEUTSCHE BANK TRUST COMPANY AMERICAS, et al.,

Case No. 12-cv-0064 (WHP)

Plaintiffs,

-against-

NOTICE OF WITHDRAWAL OF APPEARANCE AND REQUEST FOR REMOVAL FROM ECF SERVICE

OHLSON ENTERPRISES, et al.,

Defendants.

PLEASE TAKE NOTICE that Hadi Khatib, Esq. of Akerman Senterfitt LLP, who entered his appearance on behalf of:

- Carol E. Martin, as Trustee of the Alpheus L. Ellis 1993 Grandchildren's Trust FBO Christine Gagnon;
- Alpheus L. Ellis 1993 Grandchildren's Trust FBO Christine Gagnon;
- Christine Gagnon, Individually and as Trustee of the Alpheus L. Ellis 1993 Grandchildren's Trust FBO Christine Gagnon;
- Carol E. Martin, as Trustee of the Alpheus L. Ellis 1993 Grandchildren's Trust FBO Helen Jo Cahalin;
- Alpheus L. Ellis 1993 Grandchildren's Trust FBO Helen Jo Cahalin;
- Helen Jo Cahalin, Individually and as Trustee of the Alpheus L. Ellis 1993 Grandchildren's Trust FBO Helen Jo Cahalin;
- Carol E. Martin, as Trustee of the Alpheus L. Ellis 1993 Great Grandchildren's Trust;
- Don Hall, as Trustee of the Alpheus L. Ellis 1993 Great Grandchildren's Trust;
- Alpheus L. Ellis 1993 Great Grandchildren's Trust;
- Alpheus L. Ellis 1993 Trust FBO Carol E. Martin;
- Carol E. Martin, Individually and as Trustee of the Alpheus L. Ellis 1993 Trust FBO Carol E. Martin; and
- Don Hall, as Trustee of the Alpheus L. Ellis 1993 Trust FBO Carol E. Martin.

(collectively the "Defendants") in the above-captioned cases, hereby withdraws his appearance and requests that he be removed from the CM/ECF noticing list and any other service list in this case.

PLEASE TAKE FURTHER NOTICE that Susan F. Balaschak, Esq. of Akerman Senterfitt LLP remains as counsel to the Defendants and request that she remain on, and/or be added to, the CM/ECF noticing list and any other service list.

PLEASE TAKE FURTHER NOTICE that Hadi Khatib, Esq. of Akerman Senterfitt LLP requests removal from the CM/ECF notification system as well as all other means of written or electronic notification lists.

Dated: March 1, 2013 New York, New York Respectfully Submitted,

AKERMAN SENTERFITT LLP

/s/Hadi Khatib

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Attorneys for Defendants

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Christine Gagnon, Individually and as Trustee of the Alpheus L. Ellis 1993 Grandchildren's Trust FBO Christine Gagnon;

Carol E. Martin, as Trustee of the Alpheus L. Ellis 1993 Grandchildren's Trust FBO Helen Jo Cahalin;

Alpheus L. Ellis 1993 Grandchildren's Trust FBO Helen Jo Cahalin;

Helen Jo Cahalin, Individually and as Trustee of the Alpheus L. Ellis 1993 Grandchildren's

Trust FBO Helen Jo Cahalin;

Carol E. Martin, as Trustee of the Alpheus L. Ellis 1993 Great Grandchildren's Trust;

Don Hall, as Trustee of the Alpheus L. Ellis 1993 Great Grandchildren's Trust;

Alpheus L. Ellis 1993 Great Grandchildren's Trust;

Alpheus L. Ellis 1993 Trust FBO Carol E. Martin;

Carol E. Martin, Individually and as Trustee of the Alpheus L. Ellis 1993 Trust FBO Carol E. Martin; and

Don Hall, as Trustee of the Alpheus L. Ellis 1993 Trust FBO Carol E. Martin.

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